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COUNTY OF SANTA CLARA

14	KAITLIN TALLEY, on behalf of herself and all others similarly situated,	) Case No. 22CV403416) Honorable Charles F. Adams) Dept. 7
15		)
16	Plaintiff,	)
17	v.	) DECLARATION OF KAITLIN TALLEY) IN SUPPORT OF PLAINTIFF'S) MOTION FOR COURT APPROVAL OF) PAGA SETTLEMENT
18	TRAVEL NURSE ACROSS AMERICA, LLC	)
19	an Arkansas limited liability company; and	)
20	DOES 1 to 100,	) Date: May 8, 2025) Time: 1:30 p.m.) Dept.:7
21	Defendants.	)
		) Action filed: September 22, 2022

I, Kaitlin Talley, declare:

1. I am the Plaintiff in this action. The following is based on my personal knowledge, and if called as a witness, I would and could competently testify.

2. I was employed as a Registered Nurse with Defendant Travel Nurse Across America, LLC from March 27, 2022 to June 20, 2022.

3. During the pendency of this case, I spent time with my attorneys discussing the nature of my complaints and the state of my case. I have assisted in the prosecution of this case by reviewing my own documents with the attorneys, identifying witnesses, reviewing documents from my attorneys, and answering discovery while the case was in arbitration. I participated in the mediation of this case telephonically and only gave my approval to settle after being fully informed by my counsel.

4. I understood that this action was being prosecuted on behalf of the State of California as a private attorney general, on my behalf, and for other aggrieved employees. During the pendency of this lawsuit, I was required to provide assistance to my attorneys, including frequently discussing the case with them and providing them with information. I have spent a significant amount of time discussing this matter with my attorneys on many occasions and explaining my understanding of the company's policies and practices, as well as reviewing Defendant's produced documents. Further, I was involved in the negotiations that led to the settlement. I also reviewed and signed the MOU, Settlement Agreement, and this Declaration. Throughout this approximately two-year old case, I have continuously been kept apprised of the case status and was willing to take this matter to trial after my individual arbitration

5. I was aware that the mere filing of the action and participation could jeopardize my future employability.

6. I am aware and have been aware from the inception of the case, that there is the risk that if I did not win, then I could be liable for Defendant's costs. I accepted that risk.

7. I understood from the inception of the case that a representative lawsuit could take longer than an individual action and I accepted that burden.

8. I believe that the settlement is fair, adequate, and reasonable for the aggrieved employees and the State of California. I am proud of the result and accomplishment of this lawsuit given the procedural posture of this case and the likelihood of recovery at trial.

9. I support my attorneys' request for fees as I believe the attorney fee request of \$297,500.00 to be reasonable in light of the excellent work and favorable result my attorneys achieved for me and the aggrieved employees. I understand that the attorneys are requesting to be awarded attorneys' fees of 35% of the gross settlement fund of \$850,000.00. The request of 35% is fair and reasonable especially in light of the work performed and the excellent result received. I also understand that my lawyers from Janelle Carney – Attorney at Law, APC and Frontier Law Center have spent not less than 287 hours on the case. I recognize that the attorneys will spend more time on this case throughout the final distribution over the course of the next few months. I agree that my attorneys' fee request of \$850.00 an hour for Janelle Carney of Janelle Carney Attorney at Law, APC, \$650.00 an hour for Manny Starr, and \$850.00 an hour for Adam Rose of Fronter Law Center; are fair and reasonable hourly rates that I agreed upon when I retained counsel. I further support my attorneys' request for reimbursement of all costs of up to \$15,000.00. I understand that my lawyers expended not less than \$11,008.00 and will expend more money throughout the final distribution period. Accordingly, I do believe that the attorneys' costs request of a maximum amount of up to \$15,000.00, should be approved as reasonable and necessary.

10. I signed a Joint Prosecution Agreement approving the following fee split between my counsel's firms:

<u>Attorney</u>	<u>Percentage of Fee Award</u>
Janelle Carney – Attorney at Law APC	50%
Frontier Law Center	50%

11. Based on the excellent result, I reiterate my full support for the entirety of the settlement and request that the Court enter the proposed Approval Order.

I declare under penalty of perjury under the laws of the state of California that the foregoing is true and correct.

Executed on 12/13/2024.

DocuSigned by:
Kaitlin Talley
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Kaitlin Talley